

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

HANLEY GOMEZ,  
a/k/a "Ace,"  
DARNELL WOODHOUSE,  
DONALD WALLACE,  
FRANLI SANTIAGO, and  
LINDA TREMVICHARNKUL,

Defendants.

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: INDICTMENT

: 14 Cr.

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x

14 Cr. CRM 459

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED JUL 10 2014

COUNT ONE

(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

1. From at least in or about April 2014, up to and including on or about June 10, 2014, in the Southern District of New York and elsewhere, HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the

JUDGE SCHEINDLIN

defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substances that HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, conspired to distribute and possess with intent to distribute were five kilograms and more of mixtures and substances containing a detectable amount of cocaine, and one kilogram and more of mixtures and substances containing a detectable amount of heroin, both in violation of 21 U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Conspiracy to Interfere with Commerce by Threats or Violence)

The Grand Jury further charges:

4. From at least in or about April 2014, up to and including on or about June 10, 2014, in the Southern District of New York and elsewhere, HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section

1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, GOMEZ, WOODHOUSE, WALLACE, SANTIAGO, TRAMVICHARNKUL, and others agreed to commit an armed robbery of individuals believed to be engaged in narcotics trafficking.

(Title 18, United States Code, Section 1951.)

COUNT THREE

(Possession of a Firearm During a Crime of Violence and Drug Trafficking Offense)

The Grand Jury further charges:

5. On or about June 10, 2014, in the Southern District of New York, HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, during and in relation to a crime of violence and a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One and the robbery conspiracy charged in Count Two, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of the offense and any and all property used and intended to be used in any manner and part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

7. As a result of committing the offense alleged in Count Two of this Indictment, HANLEY GOMEZ, a/k/a "Ace," DARNELL WOODHOUSE, DONALD WALLACE, FRANLI SANTIAGO, and LINDA TRAMVICHARNKUL, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense alleged in Count Two of this Indictment.

SUBSTITUTE ASSETS PROVISION

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

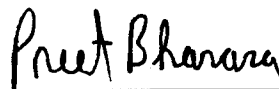
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Sections 641, 981(a)(1)(C), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 853, 981, and 1951;  
Title 28, United States Code, Section 2461.)

  
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FOREPERSON

  
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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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INDICTMENT

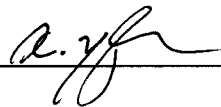
14 Cr.

(21 U.S.C. §§ 846, 841(a)(1), and  
841(b)(1)(A),  
18 U.S.C. §§ 924(c), 1951, and 2.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

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7/10/14 - Filed Indictment  
is assigned to Judge Shemkin  
Judge Fox  
USMA